

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

LAURA ALLEN, INDIVIDUALLY; And As
ADMINISTRATRIX OF THE ESTATE
OF DANIEL ALLEN; And AS NEXT FRIEND
OF TAYLOR ALLEN AND DANIELLE
ALLEN; And MARK ALLEN,

Plaintiffs;

v.

MARTIN SURFACING, A Division of
SOUTHWEST RECREATIONAL
INDUSTRIES; SOUTHWEST
RECREATIONAL INDUSTRIES, INC., d/b/a
MARTIN SURFACING,

Defendants.

CIVIL ACTION
No.: 05-40048-FDS

Defendant Southwest Recreation d/b/a Martin Surfacing, Inc's
Initial Disclosures
Pursuant to Fed. R. Civ. P. 26(a)(1) and Local Rule 26.2

NOW comes the Defendant, Southwest Recreation, and makes the following as his Initial Disclosures herein:

1. **Rule 26.1 (b)(2)(a): All Persons Known to this Defendant, Who Witnessed the Occurrence or Have Substantial Discoverable Information Regarding Same:**

1. Reed J. Seaton;
2. Robert N. Wolesnesky;
3. Ronald Ryba;
4. Laura Allen;
5. Taylor Allen;
6. Danielle Allen;
7. Mark Allen;
8. Representative(s), Martin Surfacing, Inc.;

9. Representative(s), Southwest Recreational Industries, Inc.;
10. Representative(s), Dynamic Sports Construction, Inc.;
11. Representative(s), College of the Holy Cross;
12. Timothy Bridges;
13. Alfred Morobito
14. Representative(s), Pfizer, Inc.;
15. Representative(s), Parke-Davis, a division of Warner-Lambert Company;
16. Representative(s), Meadowbrook Insurance Group/TPA Associates
17. Representative(s), Independent School Compensation Corporation;
18. Scott M. Merrill;
19. Jack McCann;
20. Gerard A. Zimmerman;
21. Lenny Raymond;
22. Joan E. Champagne;
23. Marcie Wolinsky-Friedland, M.D.;
24. Leo Fanning;
25. Bob Griffin; and
26. Dick Regan

2. **Rule 26.1 (b)(2)(b): All Opposing Parties From Whom Statements Have Been Taken:**

1. None

3. **Rule 26.1 (b)(2)(c): All Government Agencies Known to Have Investigated Occurrence:**

1. None

4. **List of Documents Voluntarily Provided Herewith in Lieu of Formal Discovery:**

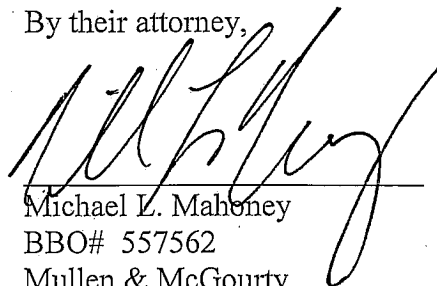
1. This defendant agrees to make available for copying a full and complete copy of any and all insurance policies which do or may provide coverage for this defendant with respect to the matter, upon receipt of the same. (Previously Provided)

As discovery is just underway, and the Defendant is in bankruptcy, the Defendant reserves the right to supplement these disclosures.

Dated: July 7, 2006

Respectfully submitted,
The Defendant,
Southwest Recreation d/b/a
Martin Surfacing, Inc.

By their attorney,

A handwritten signature in black ink, appearing to read 'Michael L. Mahoney', is written over a horizontal line.

Michael L. Mahoney

BBO# 557562

Mullen & McGourty

52 Temple Place, 4th Floor

Boston, MA 02111

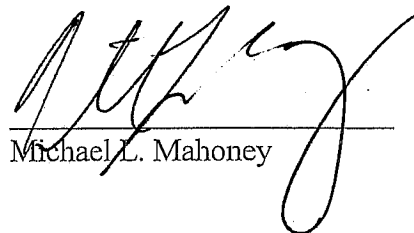
(617) 338-9200

CERTIFICATE OF SERVICE

I, Michael L. Mahoney, hereby certify that I have served a true copy of the within document this 2 of July, 2006 via electronic mail (e-filing) and first class mail, postage prepaid upon the following:

Michael R. Hugo, Esq.
Lopez Hodes Restaino Milman & Skikos
95 Commercial Wharf
Boston, MA 02110

Anthony Tarricone
Sarrouf, Tarricone & Flemming
95 Commercial Wharf
Boston, MA 02110



Michael L. Mahoney